

**Appellate Division of the Supreme Court
of the State of New York
First Judicial Department**

I, Susanna Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, certify that

Andrew Zenner Michaelson

was duly licensed and admitted to practice as an Attorney and Counsellor at Law in all the courts of the State of New York on June 28, 2004, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counsellors at Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an attorney and counsellor at law.

In Witness Whereof, I have hereunto set my
hand and affixed the seal of this court on
October 21, 2020



Clerk of the Court